

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
CRIMINAL NUMBER 11-103 (ADM)

UNITED STATES OF AMERICA,	)	<b>INDICTMENT</b>
	)	
Plaintiff,	)	(18 U.S.C. § 2251(a))
	)	(18 U.S.C. § 2251(e))
v.	)	(18 U.S.C. § 2252(a)(2))
	)	(18 U.S.C. § 2252(b)(1))
DONNA MARY ZAUNER,	)	(18 U.S.C. § 2253(a))
	)	
Defendant.		

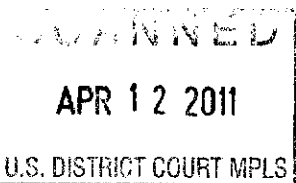
THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1  
(Conspiracy to Produce Child Pornography)

From in or about September 2010 through in or about October 2010, in the State and District of Minnesota and elsewhere, the defendant,

**DONNA MARY ZAUNER,**

and a person known to the Grand Jury ("the First Known Conspirator") did knowingly conspire and agree to employ, use, persuade, induce, entice, and coerce H.H. and B.Z., both minors, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were produced using materials, including a Samsung cellular telephone, that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).



FILED **APR 12 2011**  
RICHARD U. SLETTEN, CLERK  
JUDGMENT ENTERED \_\_\_\_\_  
DEPUTY CLERK'S INITIALS \_\_\_\_\_

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**COUNT 2**

(Production of Child Pornography)

On or about September 21, 2010, in the State and District of Minnesota, the defendant,

**DONNA MARY ZAUNER,**

did employ, use, persuade, induce, entice, and coerce H.H., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, including but not limited to the computer image file titled "FILE0265.jpg," which visual depiction was produced using materials, including a Samsung cellular telephone, that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT 3**

(Production of Child Pornography)

On or about October 4, 2010, in the State and District of Minnesota, the defendant,

**DONNA MARY ZAUNER,**

did employ, use, persuade, induce, entice, and coerce B.Z., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, including but not limited to the computer image file titled "FILE0121.jpg," which visual depiction was produced using materials, including a Samsung cellular telephone, that had been mailed, shipped, and transported

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in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT 4**

(Distribution of Child Pornography)

On or about September 21, 2010, in the State and District of Minnesota, the defendant,

**DONNA MARY ZAUNER,**

did knowingly distribute, using a means and facility of interstate and foreign commerce, a visual depiction, that is, a computer image file titled "FILE0265.jpg," where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct, in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

**FORFEITURE ALLEGATIONS**

Counts 1 through 4 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

As a result of the foregoing offenses, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine,

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periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110, United States Code;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including:

- a. Samsung cellular telephone, FCC ID A3LSPHM550;
- b. Digital SD media card, serial number MBMB51M4GBAA-M2;
- c. Apple iPhone cellular telephone;
- d. Chrysler Sebring automobile, VIN 4C3AG42GX3E073369;
- e. Dell laptop computer, model PP31L, service tag number 7RLJTH1, serial number CN-0P79H-48643-8B065-A00;
- f. Dell laptop computer, model PP1 Inspiron 7500, service tag number Y92FM; and
- g. IBM 20GB Travelstar hard drive, model DJSA-2200; serial number TH-0615TW-12567-065-0CN1.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

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All in violation of Title 18, United States Code, Sections  
2251(a), 2251(e), 2252(a)(2), 2252(b)(1) and 2253(a).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON